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Docket Management System
 U.S. Department of Transportation
 400 Seventh St., SW, PL- 401
 Washington, D.C. 20590-0001

Comments on Docket No. FAA-2002-13378

-3680

Ladies and Gentlemen:

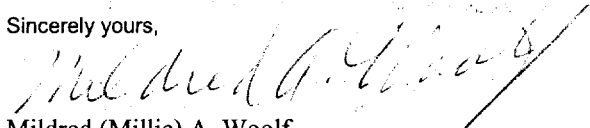
Air Animal has been shipping pets for the past 25+ years. My husband, a practicing veterinarian in Tampa, FL, and I own and operate this business. We were also founding members of IPATA and are both Past Presidents of IPATA (Independent Pet and Animal Transportation Association International) and AATA (the Animal Transportation Association). We support the welfare of animals in transit. We commend the airlines and the USDA for the strides they have made toward this end. Air Animal is and IATA air cargo sales agency and we are registered with the USDA as an intermediate handler (58-H-0117).

Because of my interest in and involvement with shipping dogs, cats and other species of animals, I am very committed to their safe air travel. However, I am also very concerned that the government not create regulations that discourage air carriers from transporting dogs, or that unnecessarily increase the cost and red tape to the public of shipping animals by air. I believe that the FAA's proposed rule is overly broad, and could create a burden on air carriers that could cause them to restrict or eliminate carriage of animals. It could also result in the imposition of unnecessary costs on the public who ship animals. I believe the FAA's proposed rule should be modified in the following ways:

1. It is not practical for airlines to report incidents of loss, injury or death to all warm and cold blooded animals, as currently proposed by the FAA. For example, this would require air carriers to assess the health of tropical fish, reptiles, scorpions, and many other species. If air carriers are required to do this, more of them may decide to embargo carrying animals at all, such as some "low cost" carriers already do. This would be detrimental to the very public whose interests this rule is designed to serve. **I believe that the reporting of incidents should be restricted to dogs and cats only.** These are the species that were of concern to Congress in the consideration of the underlying legislation that led to this rule.
2. I believe that the proposed rule defines "incident" too broadly. A carrier should be required to initiate an investigation and file a report **only when a complaint of loss, injury or death of a dog or cat has been filed by the owner or shipper.**
3. I am concerned about the privacy of persons who ship dogs and cats which may be involved in an incident, as defined by the FAA. I believe the FAA rule should make clear that **only the number, nature, and cause of incidents should be publicly reported. Information about the name of the owner and the name of the animal involved in the incident should not be included in information about incidents which is reported to or made available to the public.**
4. I object to the use of the word "guardian" in the proposed rule. "Guardian" is a meaningless term, and reflects a political agenda that is not relevant to this issue. This word is unnecessary. **Reports should list only the consignor and consignee of the shipment.**

I strongly urge the FAA to modify the proposed rule by taking into account the comments above.

Sincerely yours,



Mildred (Millie) A. Woolf
 President
 Air Animal, Inc.